

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE DIDI GLOBAL INC. SECURITIES  
LITIGATION

Master Docket 1:21-cv-05807-LAK

This Document Relates to: All Actions

**STIPULATION AND [PROPOSED] ORDER REGARDING THE SERVED  
UNDERWRITER DEFENDANTS' TIME TO ANSWER OR MOVE TO DISMISS**

WHEREAS, this action is governed by the lead plaintiff and lead plaintiff's counsel selection procedures of the Private Securities Litigation Reform Act of 1995 ("PSLRA"), 15 U.S.C. § 78u-4(a)(3);

WHEREAS, on October 12, 2021, this Court appointed Junhong Cao as Lead Plaintiff and The Rosen Law Firm, P.A. as Lead Counsel for the Class;

WHEREAS, on October 22, 2021, this Court entered a stipulation between Lead Plaintiff and Defendant DiDi Global Inc., setting a schedule for (i) Lead Plaintiff to file a consolidated amended complaint; (ii) Defendant DiDi Global Inc. to answer or otherwise respond to such complaint; and (iii) briefing a potential motion to dismiss;

WHEREAS, on or about October 26, 2021, Defendants Goldman Sachs (Asia) L.L.C.; Morgan Stanley & Co. LLC; J.P. Morgan Securities LLC; BofA Securities, Inc.; Barclays Capital Inc.; Citigroup Global Markets Inc.; HSBC Securities (USA) Inc.; UBS Securities LLC; and Mizuho Securities USA LLC (the "Served Underwriter Defendants") were served with the July 6, 2021 complaint in *Espinal v. DiDi Global Inc.*, Case No 1:21-cv-05807;

WHEREAS, this Court's October 12, 2021 order consolidated the complaint in *Espinal* with the complaints in *Chopra v. DiDi Global Inc.*, Case No. 1:21-cv-5973; *Kucharski v. DiDi Global Inc.*, Case No. 1:21-cv-6603; and *Hechler v. DiDi Global Inc.*, Case No. 1:21-cv-7750.

WHEREAS, Lead Plaintiff, Defendant DiDi Global Inc., and the Served Underwriter Defendants agree that the October 22, 2021 schedule should also apply to the Served Underwriter Defendants;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval:

1. No Served Underwriter Defendants shall have any obligation to respond to the July 6, 2021 *Espinal* complaint with which they were served.

2. If any of the Served Underwriter Defendants are named as defendants in the Consolidated Amended Complaint to be filed on January 7, 2022, those Served Underwriters shall answer or otherwise respond to the Consolidated Amended Complaint by March 8, 2022.

3. If the Served Underwriter Defendants move to dismiss the Amended Complaint, Lead Plaintiff shall file any opposition to such motion on or before May 9, 2022, and the Served Underwriter Defendants shall file any reply in support of such motion on or before June 23, 2022.

Dated: November 12, 2021

Respectfully submitted,

/s/ Laurence Rosen

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SO ORDERED:

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Lewis A. Kaplan  
United States District Judge